

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

[illegible]

Case No. 21-32094-KLP
Chapter 13

OBJECTION TO CONFIRMATION

COMES NOW the Chapter 13 Trustee, Suzanne E. Wade, and moves this Court to deny confirmation of the plan dated July 29, 2021, for the cause as follows:

1. The Debtor filed this Chapter 13 Petition, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, on July 2, 2021 under 11 U.S.C. Chapter 13.
2. This Objection is filed pursuant to 11 U.S.C. § 1325.
3. The above-filed Chapter 13 case is not eligible for confirmation due to the Debtors' failure to provide proof of filing all required tax returns pursuant to 11 U.S.C §1325 (a)(9). The Trustee requests the Debtor forward copies of his state and federal individual income tax returns for the 2020 tax year.

WHEREFORE, for the reasons stated herein, the Chapter 13 Trustee respectfully moves the Court to deny confirmation of the Debtor's proposed Chapter 13 Plan, and for such further and other relief as the Court deems necessary.

Date: August 27, 2021

/s/ Suzanne E. Wade
Chapter 13 Trustee

Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 31868
7202 Glen Forest Dr., Suite 202
Richmond, Virginia 23226
(804) 775-0979

CERTIFICATE OF SERVICE

I hereby certify a true copy of the foregoing OBJECTION TO CONFIRMATION was served by first-class mail, postage prepaid, this 27th day of August, 2021, upon the Debtor, Frederick Eugene Winston at 1790 Shallow Well Road, Manakin Sabot, VA 23103. Debtors' counsel, James E. Kane, Esquire, was served by electronic notification to jkane@kaneandpapa.com.

/s/ Suzanne E. Wade
Chapter 13 Trustee

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re: Frederick Eugene Winston, Debtor)
)
)
1790 Shallow Well Road)
Manakin Sabot, VA 23103)
)
XXX-XX- 6492)
)

Case No. 21-32094-KLP
Chapter 13

NOTICE OF OBJECTION TO CONFIRMATION

Suzanne E. Wade, Chapter 13 Trustee, has filed papers with the Court objecting to the confirmation of your Chapter 13 Plan dated July 29, 2021.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief sought in the Objection, or if you want the Court to consider your views on the Objection, then on or before three (3) days before the date of the hearing, you or your attorney must:

File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough that the Court will **receive** it on or before the date stated below.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

You must also mail a copy to:

Suzanne E. Wade, Chapter 13 Trustee
7202 Glen Forest Dr., Suite 202
Richmond, Virginia 23226

X Attend the hearing on the Objection, scheduled to be held **REMOTELY** on **September 8 2021 at 9:10 a.m.**

REMOTE HEARING INFORMATION:

Due to the COVID-19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the “Zoom Request Form”), which is available on the Court's internet website at www.vaeb.courts.gov, on the page titled, “Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information.” Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge’s attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an order granting that relief.

Date: August 27, 2021

/s/ Suzanne E. Wade
Suzanne E. Wade, Chapter 13 Trustee

Suzanne E. Wade, Chapter 13 Trustee
Virginia State Bar Number 31868
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/s/ Suzanne E. Wade
Chapter 13 Trustee